

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LOUIS DREYFUS CORPORATION,

07 CV 6622 (WHP)

Plaintiff,

-against-

ANSWER TO  
CROSS-CLAIM  
WITH AFFIRMATIVE  
DEFENSES

M/V CMA CGM CORTES, her engines,  
boilers, tackle, etc., ALPHA SHIPMANAGEMENT  
GMBH & CO., KG, ALPHA SHIP GMBH & CO. KG  
MS "NEPTUN", COMPANIA SUD AMERICANA DE  
VAPORES S.A. (C.S.A.V.),

Defendants.

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Defendant COMPANIA SUD AMERICANA DE VAPORES S.A.  
(C.S.A.V.) ("CSAV"), by its attorneys MAHONEY & KEANE, LLP,  
answers, without waiver of any rights to arbitrate or proceed in an  
alternative forum, the Cross-Claim of defendant ALPHA SHIP GMBH &  
CO. KG MS "NEPTUN", upon information and belief, as follows:

FIRST: Defendant CSAV denies knowledge or information  
sufficient to form a belief as to the allegations contained in  
paragraphs "30" and "31" of defendant ALPHA SHIP GMBH & CO. KG MS  
"NEPTUN"'s Cross-Claim.

SECOND: Defendant CSAV admits the allegations contained  
in paragraph "32" of defendant ALPHA SHIP GMBH & CO. KG MS  
"NEPTUN"'s Cross-Claim.

THIRD: Defendant CSAV denies each and every allegation  
contained in paragraphs "33" and "34" of defendant ALPHA SHIP GMBH  
& CO. KG MS "NEPTUN"'s Cross-Claim.

AS AND FOR A FIRST SEPARATE AND COMPLETE AFFIRMATIVE DEFENSE

FOURTH: Defendant CSAV repeats, reiterates and makes applicable to defendant ALPHA SHIP GMBH & CO. KG MS "NEPTUN"'s Cross-Claim each Separate and Complete Affirmative defense in CSAV's Answer to plaintiff's Complaint as if specifically set forth herein at length.

WHEREFORE, defendant COMPANIA SUD AMERICAN DE VAPORES S.A. demands judgment dismissing the Cross-Claim herein, and awarding CSAV costs, fees, including reasonable attorneys' fees and disbursements of this action and such other and further relief as to the Court may seem just and proper.

Dated: New York, N.Y.  
March 25, 2008

MAHONEY & KEANE, LLP  
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COMPANIA SUD AMERICANA DE VAPORES SA

By: 

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